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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

TRUSTEES OF THE PLUMBERS AND  
PIPEFITTERS UNION LOCAL 525  
HEALTH AND WELFARE TRUST AND  
PLAN; TRUSTEES OF THE PLUMBERS  
AND PIPEFITTERS UNION LOCAL 525  
PENSION PLAN; AND THE TRUSTEES OF  
THE PLUMBERS AND PIPEFITTERS  
LOCAL UNION 525 APPRENTICE AND  
JOURNEYMAN TRAINING TRUST FOR  
SOUTHERN NEVADA,

Plaintiffs,

vs.

JUAN CARRILLO SOTELO dba SOTELO  
AIR; SOTELO AIR, INC., dba COOL AIR  
NOW; AEGIS SECURITY INSURANCE  
COMPANY, a Pennsylvania corporation;  
AMERICAN SAFETY CASUALTY  
INSURANCE COMPANY, a Georgia  
corporation,

Defendants.

Case No. 2:13-cv-00657-RFB-NJK

**MOTION TO SEAL AND FILE  
REDACTED EXHIBIT**

Plaintiffs, Trustees of the Plumbers and Pipefitters Union Local 525 Health and Welfare  
Trust, the Trustees of the Plumbers and Pipefitters Union Local 525 Pension Plan, and the  
Trustees of the Plumbers and Pipefitters Local Union 525 Apprentice and Journeyman Training

Trust for Southern Nevada (collectively "Local Funds"), respectfully submit this Motion to Seal and File Redacted Exhibit.

### POINTS AND AUTHORITIES

#### I. Factual background.

On June 13, 2014, the Local Funds filed their Motion for Summary Judgment, which inadvertently included certain confidential information on Bates numbers PLUM000256, PLUM000259 and PLUM000144 included in Exhibit 8 to that Motion. (ECF No. 47.) On December 1, 2014, nonparties Trustees of the Plumbers and Pipefitters National Pension Fund and International Training Fund (collectively "National Funds") filed a Motion to Consolidate Cases, which also included certain confidential information on Exhibits 1 and 2 attached thereto. (ECF No. 51.)

#### II. Argument.

##### A. Request to seal.

Federal Rule of Civil Procedure 5.2 prohibits the electronic filing of the same certain confidential information that was filed with the Court by the Local Funds and the National Funds. Accordingly, the Local Funds respectfully request this Court enter an Order directing the Clerk to seal Exhibit 8 to the Local Funds' Motion for Summary Judgment and Exhibits 1 and 2 to the National Funds' Motion to Consolidate.

##### B. Request for order to file redacted exhibit.

The Local Funds have already filed a redacted Exhibit 8 to their Motion for Summary Judgment. (ECF No. 54.) The National Funds have also already filed a redacted Exhibit 2 to their Motion to Consolidate. (ECF No. 52.) The only exhibit that remains to be refiled as a redacted exhibit is Exhibit 1 to the National Funds' Motion to Consolidate. Accordingly, the Court may also Order the National Funds to file a redacted version of that same exhibit.

#### III. Conclusion.

For the foregoing reasons, the Local Funds respectfully request the Court grant their Motion to Seal and File Redacted Exhibit by issuing an Order directing the Court Clerk to seal

1 Exhibit 8 to the Local Funds' Motion for Summary Judgment (ECF No. 47) and Exhibits 1 and 2  
2 to the National Funds' Motion to Consolidate (ECF No. 51), and also order the National Funds to  
3 file a redacted version of Exhibit 1 to that same Motion.

4 Dated: December 22, 2014

BROWNSTEIN HYATT FARBER SCHRECK, LLP



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Attorneys for Plaintiffs

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11 **IT IS SO ORDERED.**

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15 RICHARD F. BOULWARE, II  
16 United States District Judge

17 DATED: December 23, 2014.  
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**CERTIFICATE OF SERVICE**

Pursuant to Federal Rule of Civil Procedure 5(b), I certify that I am an employee of Brownstein Hyatt Farber Schreck, LLP and that on December 22, 2014, I served a true copy of the foregoing **MOTION TO SEAL AND FILE REDACTED EXHIBITS** upon:

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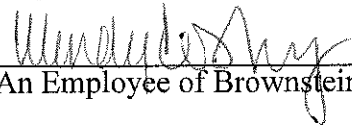
*Attorneys for Defendants Juan Carrillo  
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☒ a. **BY CM/ECF System**

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☒ b. **BY U.S. Mail**

**I declare under penalty of perjury that the foregoing is true and correct.**

  
An Employee of Brownstein Hyatt Farber Schreck, LLP

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